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February 11, 2009

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## VIA HAND DELIVERY

Jack Gould, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

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RE: MJR 6054 – Don Caldwell and Brad S. Combs

Dear Mr. Gould:

This is an amended response submitted on behalf of Don Caldwell and Brad S. Combs (collectively "Respondents") in relation to the August 26, 2008 letters from the Federal Election Commission ("FEC") notifying the Respondents of a complaint filed by Citizens for Responsibility and Ethics in Washington ("Complaint"). The original response from the Respondents was submitted on October 17, 2008. Pursuant to 2 U.S.C. § 437g(a)(1), no action should be taken against the Respondents.

### **Statement of Facts**

Don Caldwell is the General Manager for 1099 L.C. d/b/a Venice Nissan Dodge. Brad S. Combs is the Finance Manager for 1099 L.C. d/b/a Venice Nissan Dodge. In September of 2005, Don Caldwell made one \$2,100 contribution to Vern Buchanan for Congress (Committee ID: C00412759). Brad S. Combs has never made a contribution to Vern Buchanan for Congress.

### **Response**

The Respondents deny the allegations contained in the Complaint as it pertains to them. Specifically, Carlo Bell implies in his affidavit that Don Caldwell coerced him into making contributions to Vern Buchanan for Congress and then alleges Don Caldwell reimbursed him for the contributions. See Affidavit of Carlo Bell at ¶¶ 3, 4, and 5. David Padilla alleges in his affidavit that Brad S. Combs attempted to reimburse him for a contribution to Vern Buchanan for Congress. See Affidavit of David Padilla at ¶ 2. However, these allegations are directly contradicted by the attached affidavits signed by the Respondents. See Exhibits A and B.

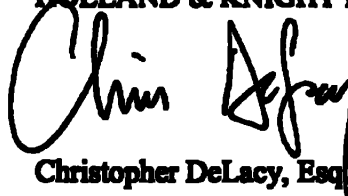
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Based on the foregoing, I request the FEC not take any action in this matter as it relates to the Respondents.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Chris DeLacy", written over the printed name.

Christopher DeLacy, Esq

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